

Memorandum

Date : January 14, 2005

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To : John L. Geesman, Presiding Member
Gary Fay, Hearing Officer

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From : California Energy Commission - James W. Reede, Jr., Ed.D
1516 Ninth Street
Sacramento, CA 95814-5512
Energy Facility Siting Project Manager

Subject : Errata to the Roseville Energy Park (03-AFC-01) Final Staff Assessment

Attached is Errata to the Traffic and Transportation Analysis filed by staff in the Roseville Energy Park FSA. This was the last of the issues to be resolved in the proceeding.

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TRAFFIC AND TRANSPORTATION ERRATA

During the Committee sponsored Issues Workshop, staff agreed to modify the language in Condition of Certification **Trans-7** to require the cooling towers to be designed and constructed to be able to accommodate plume abatement technology. After working with the applicant on specific language, staff is proposing the following condition. The areas in underline and strikeout type are the only areas remaining that applicant and staff have yet to agree.

TRANS-7 The project owner shall design and construct the cooling towers to be able to accommodate plume abatement technology. Upon commencement of power plant operation, the project owner shall install video cameras, video recording equipment, and visible range measurement methods or equipment and shall operate the equipment during daylight hours for the months October through March in accordance with the approved monitoring plan. If the cooling towers generate ground-hugging plumes that reduce driver sight distance visibility (using sight distance measurement standards in the Caltrans Highway Design Manual, 2001) to less than 150 feet on local roadways with posted speed limits up to 30 mph, or to less than 300 feet on local roadways with posted speed limits of up to 50 mph, or a vehicle accident is reported that identifies a ground-hugging plume as a contributing factor, or a legitimate traffic safety-related complaint is received that identifies a ground-hugging plume as a factor, the project owner shall be required to install either of the following:

1. Plume abatement technology with a dry-cooling section that has a stipulated plume abatement design point equal to the worst-case temperature and relative humidity recorded at the time that a ground-hugging plume that reduced the sight distance visibility below the levels described above were observed, or other abatement design point that the cooling tower manufacturer will guarantee to mitigate the ground-hugging plumes to visibility distances that are greater than the levels described above; or
2. An automatic control system that reduces plant operations to ensure that ground-hugging plumes do not form at the temperature, relative humidity and wind speed recorded at the time that a ground-hugging plume was observed that reduced the sight distance visibility below the levels described.

The project owner shall continue the ground-hugging plume monitoring program until either plume abatement technology or an automatic control system-as described above are installed or for three consecutive winters without observations of ground-hugging plumes that meet the sight distance visibility requirements above. Ground hugging plume monitoring may be extended beyond three years by the CPM if the power plant operating profile during the three years is less than 50 percent of its capacity factor.

If during the monitoring program a ground-hugging plume has caused sight visibility to fall below the distances stated above on a local roadway, or a vehicle accident has occurred which reports a cooling tower generated ground-hugging plume as a contributing factor, the project owner shall immediately modify plant operations as necessary to prevent ground-hugging plumes until operation of the selected ground-hugging plume prevention option and shall notify the CPM.

Verification: At least 60 days prior to construction of the cooling towers, the project owner shall provide to ~~both~~ the City of Roseville City Engineer for review and comment and to the CPM for review and approval, the engineering specifications for the cooling towers that demonstrate that plume abatement technology can be installed at a later date if appropriate. The material submitted to the CPM shall include a copy of the letter accompanying the transmittal to the City.

Prior to July 1 of the first year of plant operation, the project owner shall provide to ~~both~~ the City of Roseville City Engineer for review and comment and to the CPM for review and approval a plan for the installation and operation of video cameras, video recorders, and visible range measurement equipment or methods to monitor for cooling tower generated ground-hugging plumes on local roadways. The CPM shall consider the meteorological conditions in determining when monitoring equipment will operate. The material submitted to the CPM shall include a copy of the letter accompanying the transmittal to the City.

The project owner shall provide to the CPM, within 30 days of the end of each ground-hugging plume monitoring month (October through March) a report that provides evidence of the existence or non-existence of cooling tower generated ground-hugging plumes on local roadways, the visibility distance data recorded during such ground-hugging plume events, if any, and the power plant's capacity factor for the first four daylight hours for each day of the month when the power plant was operating. This report shall be provided on electronic media (CD, diskette, or memory stick).

If at any time during each year's ground-hugging plume monitoring period the project owner or the CPM determines that the project is causing ground-hugging plumes on local roadways that lower visibility below the standards listed in this condition, the project owner shall within 120 days provide to ~~both~~ the City of Roseville City Engineer for review and comment and to the CPM for review and approval, the engineering specifications for the ground-hugging plume prevention option chosen (abatement technology and/or automatic control system). If the project owner makes the determination that the project is causing ground-hugging plumes on area roadways that lower visibility below the standards listed in this condition, the project owner shall notify the CPM within 24 hours of making such a determination.